1 KAMER ZUCKER ABBOTT Jen J. Sarafina #9679 Dare E. Heisterman #14060 3000 W. Charleston Boulevard, Suite 3 Las Vegas, Nevada 89102-1990 Tel. (702) 259-8640 Fax (702) 259-8646 4 jsarafina@kzalaw.com dheisterman@kzalaw.com 5 Attorneys for Defendant Wynn Las Vegas, LLC 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA VINCENT FRIED, 9 Case No. 2:18-cv-00689-APG-BNW Plaintiff, 10 STIPULATION AND REQUEST TO EXTEND DEADLINE TO SUBMIT vs. 11 **JOINT PRETRIAL ORDER** WYNN LAS VEGAS, LLC, a Nevada limited 12 liability company, (First Request) Defendant. 13 14 Plaintiff Vincent Fried ("Plaintiff), by and through his counsel of record, Michael P. Balaban 15 Esq., and Defendant Wynn Las Vegas, LLC, ("Defendant" or "Wynn"), by and through its counsel 16 of record, the law firm Kamer Zucker Abbott (collectively the "Parties"), stipulate and request that 17 the Court extend the deadline to submit the Joint Pretrial Order by forty-five (45) days, up to and 18 including June 9, 2022. In support of this Stipulation and Request, the parties state as follows: 19 1. The Joint Pretrial Order deadline is currently set for April 25, 2022. See ECF No. 47. 20 2. On March 31, 2022, the parties first discussed the possibility of settlement. Those 21 discussions continued April 6, 8, 11, 15, and 21, and the parties are continuing their 22 discussions. 23 24

3. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of continuing settlement discussions and to finalize any settlement. If the parties are unable to reach resolution, the extension will allow the parties time to confer and draft the Joint Pretrial Order.

WHEREFORE, the parties respectfully request that the Court extend the deadline for the parties to submit the Joint Pretrial Order up to and including June 9, 2022.

DATED this 22nd day of April, 2022.

DATED this 22nd day of April, 2022.

/s/ Michael P. Balaban Michael P. Balaban #9370 Law Offices of Michael P. Balaban 10726 Del Rudini Street Las Vegas, Nevada 89141 Telephone: (702) 586-2964 Facsimile: (702) 586-3023

Attorney for Plaintiff, Vincent Fried

Facsimile: (702) 259-8646

/s/ Jen J. Sarafina Jen J. Sarafina #9679 Dare E. Heisterman #14060 KAMER ZUCKER ABBOTT 3000 West Charleston Boulevard, Suite 3 Las Vegas, NV 89102 Telephone: (702) 259-8640

Attorneys for Defendant, Wynn Las Vegas, LLC

IT IS SO ORDERED.

Dated: <u>April</u> 25, 2022

UNITED STATES DISTRICT COURT JUDGE